

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Jeffrey W. Dulberg (CA State Bar No. 181200) Jeffrey P. Nolan (CA State Bar No. 158923) PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Blvd., 13th Floor Los Angeles, CA 90067 Telephone: (310) 277-6910; Facsimile: (310) 201-0760 Email: jdulberg@pszjlaw.com, jnolan@pszjlaw.com  <input type="checkbox"/> Debtor(s) appearing without an attorney <input checked="" type="checkbox"/> Attorney for: Bradley Sharp, Chapter 11 Trustee	FOR COURT USE ONLY			
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>				
In re:  LESLIE KLEIN,          Debtor(s).	<table border="1"><tr><td>CASE NO.: 2:23-bk-10990-SK CHAPTER: 11</td></tr><tr><td style="text-align: center;"><b>NOTICE OF OPPORTUNITY TO REQUEST A HEARING ON MOTION  [LBR 9013-1(o)]</b></td></tr><tr><td style="text-align: center;">[No hearing unless requested in writing]</td></tr></table>	CASE NO.: 2:23-bk-10990-SK CHAPTER: 11	<b>NOTICE OF OPPORTUNITY TO REQUEST A HEARING ON MOTION  [LBR 9013-1(o)]</b>	[No hearing unless requested in writing]
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<b>NOTICE OF OPPORTUNITY TO REQUEST A HEARING ON MOTION  [LBR 9013-1(o)]</b>				
[No hearing unless requested in writing]				

**TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:**

1. Movant(s) Bradley D. Sharp, Chapter 11 Trustee for the Estate of Leslie Klein, filed a motion or application (Motion) entitled Motion of Chapter 11 Trustee for Order Authorizing the Examination of Phoenix Life Insurance Co. Pursuant to Fed. R. Bank P. 2004, Memorandum of Points & Authorities, Decs....
2. Movant(s) is requesting that the court grant the Motion without a hearing as provided for in LBR 9013-1(o), unless a party in interest timely files and serves a written opposition to the Motion and requests a hearing.
3. The Motion is based upon the legal and factual grounds set forth in the Motion. (*Check appropriate box below*):  
☐ The full Motion is attached to this notice; or  
☒ The full Motion was filed with the court as docket entry # 568, and a detailed description of the relief sought is attached to this notice.
4. **DEADLINE FOR FILING AND SERVING OPPOSITION PAPERS AND REQUEST FOR A HEARING:** Pursuant to LBR 9013-1(o), any party who opposes the Motion may request a hearing on the Motion. The deadline to file and serve a written opposition and request for a hearing is 14 days after the date of service of this notice, plus 3 additional days if you were served by mail or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).

- a. If you timely file and serve a written opposition and request for a hearing, movant will file and serve a notice of hearing at least 14 days in advance of the hearing. [LBR 9013-1(o)(4)]
- b. If you fail to comply with this deadline:
  - (1) Movant will file a declaration to indicate: (1) the Motion was properly served, (2) the response period elapsed, and (3) no party filed and served a written opposition and request for a hearing within 14 days after the date of service of the notice [LBR 9013-1(o)(3)];
  - (2) Movant will lodge an order that the court may use to grant the Motion; and
  - (3) The court may treat your failure as a waiver of your right to oppose the Motion and may grant the Motion without further hearing and notice. [LBR 9013-1(h)]

Respectfully submitted,

Date: 01/09/2024

/s/ Jeffrey P. Nolan

Signature of Movant or attorney for Movant

Jeffrey P. Nolan

Printed name of Movant or attorney for Movant

Attachment (Detailed description of relief sought):

The Motion seeks the production of records with respect to the existence of insurance policies providing for death benefits which the Debtor, his surrounding or solely-controlled businesses, or entities in which he has a financial interest were involved. Policies and the related benefits could be assets of the estate . Alternatively, the documents will provide facts surrounding numerous claims made against the estate. The Debtor has indicated he maintained no hard copies of financial records and minimal personal or business records such that the Motion seeks to provide the documents.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF OPPORTUNITY TO REQUEST A HEARING ON MOTION [LBR 9013-1(o)]** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **January 9, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **January 9, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **January 9, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 9, 2024  
Date

Rolanda Mori  
Printed Name

/s/ Rolanda Mori  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Simon Aron** saron@wrslawyers.com, moster@wrslawyers.com
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

June 2012

**F 9013-3.1.PROOF.SERVICE**

**2. SERVED BY UNITED STATES MAIL**

Phoenix Life Insurance Company  
Attn: Phillip Gass, Chief Executive Officer  
15 Tech Valley Drive  
East Greenbush, NY 12061-4137

Phoenix Life Insurance Company  
Attn: Phillip Gass, Chief Executive Officer  
One American Row  
Hartford, CT 06103

Agent for Service of Process  
Phoenix Life Insurance Company  
CT Corporation System  
330 N. Brand Blvd., Suite 700  
Glendale, CA 91203

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

Via Overnight Mail  
Honorable Sandra Klein  
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Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1582 / Courtroom 1575  
Los Angeles, CA 90012

Via Email  
Nathan Talei, Esq.  
[ntalei@ocslaw.com](mailto:ntalei@ocslaw.com)